EXHIBIT J

CONFIDENTIAL

Page 1

1   UNITED STATES DISTRICT COURT

2   FOR THE NORTHERN DISTRICT OF CALIFORNIA

3   SAN FRANCISCO DIVISION

4 _____

5 IN RE: GOOGLE PLAY STORE ANTITRUST LITIGATION
   Case No. 3:21-md-02981-JD

6

7 THIS DOCUMENT RELATES TO:

8 Epic Games Inc. v. Google LLC, et al.
   Case No. 3:20-cv-05671-JD

9

   In Re: Google Play Consumer Antitrust Litigation

10 Case No. 3:20-cv-05761-JD

11

   State of Utah, et al. v. Google LLC, et al.

12 Case No. 3:21-cv-05227-JD

13

   Match Group LLC, et al., v. Google LLC, et al.

14 Case No. 3:22-cv-02746-JD

   _____

15

                ** CONFIDENTIAL **

16

17   DEPOSITION OF MARC S. RYSMAN, PhD,

18 called as a witness by and on behalf of Google LLC,

19 pursuant to the applicable provisions of the

20 Federal Rules of Civil Procedure, before P. Jodi

21 Ohnemus, RPR, RMR, CRR, CA-CSR #13192, NH-LSR #91,

22 MA-CSR #123193, and Notary Public, within and for

23 the Commonwealth of Massachusetts, at 100 Cambridge

24 Street, Boston, Massachusetts, on Friday, March 10,

25 2023, commencing at 9:07 a.m.

CONFIDENTIAL

```
 1    APPEARANCES:

 2                    MOLO LAMKEN LLP

 3                    BY:  Lauren Weinstein, Esq.

 4                    600 New Hampshire Avenue, NW

 5                    Washington, DC  20037

 6                    202 556-2018

 7                    Lweinstein@mololamken.com

 8                           -and-

 9                    LIEF CABRASER HEIMANN & BERNSTEIN

10                    BY:  Brendan P. Glackin, Esq.

11                    275 Battery Street

12                    San Francisco, CA  94111

13                    415 956-1000

14                    Bglackin@lchb.com

15                           -and-

16                    BENEDICT LAW GROUP PLLC

17                    BY:  Brendan Benedict, Esq.

18                    (Via Telephone)

19                    Michael Altelorando, Esq.

20                    42 W. 38th Street, Suite 1002

21                    New York, NY  10018

22                    212 287-9501

23                    Brendan@benedictlawgroup.com

24                    Maltebrando@benedictlawgroup.com

25                    For the States
```

CONFIDENTIAL

Page 3

```
 1   APPEARANCES:   (CONT'D)

 2

 3                    BARTLIT BECK LLP

 4                    BY:  Karma M. Giulianelli, Esq.

 5                    1801 Wewetta Street, Suite 1200

 6                    Denver, CO  80202

 7                    303 592-3100

 8                    Karma.giulianelli@bartlitbeck.com

 9                          -and-

10                    (Via Telephone)

11                    KAPLAN FOX & KILSHEIMER LLP

12                    BY:  Hae Sung Nam, Esq.

13                    850 Third Avenue, 14th Floor

14                    New York, NY  10022

15                    Hnam@kaplanfox.com

16                    For the consumers

17

18                    HUESTON HENNIGAN LLP

19                    BY:  Tate Harshbarger

20                    523 West 6th Street, Suite 400

21                    Los Angeles, CA  90014

22                    213 788-4752

23                    Tharshbarger@hueston.com

24                    For Match Group

25
```

Page 4

```
 1   APPEARANCES:   (CONT'D)

 2

 3                    CRAVATH SWAINE & MOORE LLP

 4                    BY:  Eric Zepp, Esq.

 5                    Worldwide Plaza

 6                    825 Eighth Avenue

 7                    New York, NY  10019

 8                    212 474-1829

 9                    Ezepp@cravath.com

10                    For Epic Games

11

12

13                    (Via Telephone)

14                    STATE OF TENNESSEE

15                    OFFICE OF THE ATTORNEY GENERAL

16                    BY:  Ethan Bowers, Esq.

17                    301 6th Avenue N

18                    Nashville, TN  37243

19                    615 741-3491

20                    Ethan.bowers@ag.tn.gov

21                    For the State of Tennessee

22

23

24

25
```

Page 5

```
 1   APPEARANCES:   (CONT'D)

 2

 3                  (Via Telephone)

 4                  NEW YORK STATE OFFICE OF THE

 5                  ATTORNEY GENERAL

 6                  BY:  Bryan L. Bloom, Esq.

 7                  Timothy O'Neill, Esq.

 8                  The Capitol

 9                  Albany, NY  12224-0341

10                  Bryan.bloom@ag.ny.gov

11                  Timothyoneill@ag.ny.gov

12                  For New York State

13

14

15                  (Via Telephone)

16                  STATE OF UTAH

17                  OFFICE OF THE ATTORNEY GENERAL

18                  BY:  Bahader S. Khan, Esq.

19                  350 N. State Street, Suite 230

20                  Salt Lake City, UT  84114

21                  801 366-0260

22                  Bahader.khan@ag.ut.gov

23                  For the State of Utah

24

25
```

CONFIDENTIAL

Page 6

```
 1   APPEARANCES:   (CONT'D)

 2

 3                       MUNGER TOLLES & OLSON LLP

 4                       BY:  Justin P. Raphael, Esq.

 5                       350 S. Grand Avenue, 50th Floor

 6                       Los Angeles, CA  90071

 7                       415 512-4085

 8                       Justin.raphael@mto.com

 9                       For Google LLC

10

11

12   ALSO PRESENT:

13

14                       (Via Telephone)

15                       Jeanette Teckman, Esq.

16                       in-house counsel, Match Group

17

18                       Shawn Budd, Video Operator

19

20

21

22

23

24

25
```

CONFIDENTIAL

Page 7

1   I N D E X

2

3   TESTIMONY OF: PAGE

4

5   MARC S. RYSMAN, PhD

6   (By Mr. Raphael)   9

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

CONFIDENTIAL

Page 8

1   **E X H I B I T S**

2   **EXHIBIT   DESCRIPTION   PAGE**

3

4   Exhibit 1057   Expert Report of Marc   9

5   Rysman, October 3, 2022

6   Exhibit 1058   Expert Rebuttal Report of   9

7   Dr. Marc Rysman, December

8   23, 2022

9   Exhibit 1059   Merits Report of Hal J.   70

10   Singer, PhD

11   Exhibit 1060   Game Change: The Future of   189

12   Video Games

13   Exhibit 1061   spreadsheet, AMZ-GP_00002471   358

14

15

16

17

18

19

20

21

22

23

24

25

Page 84

1   the value of that additional happiness; right?

2   MS. WEINSTEIN: Objection to form.

3   A.   Well, I don't say that. If a -- I'd have

4   to think about what I would want to do, if I wanted

5   to calculate for a given individual what their

6   value of variety would be.

7   Q.   Right. So -- but -- but sitting here

8   today, you're not saying that the model you've

9   actually put in your report could be used to

10   reliably calculate the additional happiness any

11   consumer would experience from additional app

12   variety?

13   MS. WEINSTEIN: Objection to form.

14   A.   Well, just thinking about it now, you

15   know, I -- you could apply the -- I developed these

16   multipliers of spending that consumers would obtain

17   either from a price effect or a variety effect

18   or -- or both. And you could apply that to an

19   individual as well.

20   Q.   And do you think that would accurately

21   capture the variation among consumers in terms of

22   their different tastes and interests in different

23   apps?

24   MS. WEINSTEIN: Objection to form.

25   A.   Well, my goal's not to be perfectly

Page 85

1   accurate in this case. I make many decisions to be

2   conservative. And so I think what I would be

3   developing would be a conservative number on --

4   of -- and from my perspective, conservative

5   generates a lower damages number.

6   Q.   Would using your app variety model in this

7   case reliably tell you what the additional

8   happiness that any individual consumer would

9   experience from additional app variety?

10   MS. WEINSTEIN: Objection to form.

11   A.   I think it would be reasonable -- I could

12   see it being reasonable to use my model for -- at

13   the level of an individual applying it to

14   individual spending. I've made some conservative

15   assumptions.

16   Q.   Is spending the only variable between

17   consumers that's relevant to the happiness they

18   would get from additional app variety?

19   MS. WEINSTEIN: Objection to form.

20   A.   Say the question again.

21   Q.   Is the variation between what different

22   consumers spend the only variation between them

23   that is relevant to calculating how much additional

24   happiness each of them would get from additional

25   app variety?